



# ENZYMATIC THERAPY INCORPORATED

What **Better** feels like.™

**INTEGRATIVE THERAPEUTICS INC.™**  
NF Formulas • PhytoPharmica  
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2  
Wilsonville, OR 97070  
P: 503.582.8386 • F: 503.582.0467

**ENZYMATIC THERAPY™**  
&  
**PHYTOPHARMICA™**

825 Challenger Drive, Green Bay, WI 54311-8328  
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)  
P: 920.469.9099 • F: 920.469.4418 (Phyto)

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January 16, 2006

Office of Nutritional Products, Labeling &  
Dietary Supplements, HFS 810  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Parkway  
College Park, MD 20740

RE: Label Claims/Disclaimers


Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by PhytoPharmica, (a Division of Integrative Therapeutics, Inc.) at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
End Fatigue™ Daily Energy Enfusion™*	Multivitamin and mineral supplementation can be especially beneficial for individuals looking for additional immune support.*	Vitamin A (50% as beta carotene and as retinyl acetate), Vitamin C (as ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acetate), Riboflavin (vitamin B2), Biotin, Iodine (as potassium iodide), Magnesium (as manganese citrate), Zinc (as zinc sulfate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (from whey protein, guar gum, potassium citrate, and potassium iodide), Whey Protein, Malic Acid, Betaine, Inositol, Inulin (from chicory root), Taurine, Hesperidin 50% (from citrus fruits), Glycine, L-Tyrosine, N-Acetylcysteine (NAC), L-Serine, Stevia (Stevia rebaudiana) Leaf Extract, Boron (as sodium borate)

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By:

  
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date:

1-16-06

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

  
Michael P. Devereux  
Chief Financial Officer

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PRODUCT NAME	STATEMENTS	INGREDIENTS TO WHICH THE CLAIM REFERS
End Fatigue™ Daily Energy Enfusion™*	Amino acids support a healthy weight and help maintain muscle mass.*	Vitamin A (50% as beta carotene and as retinyl acetate), Vitamin C (as ascorbic acid), Vitamin D (as cholecalciferol), Vitamin E (as d-alpha tocopheryl acetate), Riboflavin (vitamin B2), Biotin, Iodine (as potassium iodide), Magnesium (as manganese citrate), Zinc (as zinc sulfate), Selenium (as L-selenomethionine), Copper (as copper gluconate), Manganese (as manganese citrate), Chromium (as chromium picolinate), Molybdenum (as sodium molybdate), Sodium, Potassium (from whey protein, guar gum, potassium citrate, and potassium iodide), Whey Protein, Malic Acid, Betaine, Inositol, Inulin (from chicory root), Taurine, Hesperidin 50% (from citrus fruits), Glycine, L-Tyrosine, N-Acetylcysteine (NAC), L-Serine, Stevia (Stevia rebaudiana) Leaf Extract, Boron (as sodium borate)

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